

FILED

APR 16 2025

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHINEDU OPUTE,

Defendant.

) INDICTMENT

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CASE NO.

1 : 25 CR 00166

Title 18, United States Code,
Sections 1028A(a)(1), 1343,
1349, 1956(h), and 2

JUDGE BRENNAN

GENERAL ALLEGATIONS

At all times material to this Indictment, unless otherwise specified:

1. Defendant CHINEDU OPUTE, a citizen of the Federal Republic of Nigeria and lawful permanent resident in the United States, resided in or around Sandy Springs, Georgia.

From time to time, Defendant used the alias Angel Adames.

2. Victim 1 was a government body located in Parma Heights, Ohio, in the Northern District of Ohio, Eastern Division. Victim 1 had an account ending in x7417 with Huntington National Bank (the "Victim 1 Huntington account").

3. Victim 2 was a commercial construction company located in Bedford, Ohio, in the Northern District of Ohio, Eastern Division. Victim 2 had an account ending in x9059 with United Community Bank f/k/a Seaside Bank & Trust (the "Victim 2 United account").

4. Victim 3 was a car dealership located in Everett, Washington. Victim 3 had an account ending in x0133 at Wells Fargo Bank (the "Victim 3 Wells Fargo account").

5. Overseas Dry Food Supplier LLC f/k/a Overseas Dry Food Supply LLC (“ODFS”) was a limited liability company organized under the laws of the State of Georgia on or about July 15, 2022. Angel Adames was its listed organizer and registered agent.

6. JP Morgan Chase & Co. (“Chase”) was a U.S.-based financial institution that offered financial services, including PRN bank accounts, to its customers. A “PRN,” or “pass-through,” bank account was a virtual wallet product wherein funds briefly “passed through” an established United States-based bank account before entering the true destination account, which was typically that of an online money services business or an overseas entity.

7. Airwallex US LLC (“Airwallex”) was a registered money services business that offered virtual business accounts. Airwallex purchased PRN accounts from Chase and offered them as a service to Airwallex customers. Airwallex stored its account information on servers located outside of the United States.

COUNT 1

(Conspiracy to Commit Wire Fraud and Bank Fraud, 18 U.S.C. § 1349)

The Grand Jury charges:

8. The factual allegations contained in Paragraphs 1 through 7 of the Indictment are re-alleged and incorporated by reference as if fully set forth herein.

9. From in or around July 2022 through on or about the date of this Indictment, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant CHINEDU OPUTE, and others known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate and agree with each other to commit federal fraud offenses, that is, to devise and intend to devise, a scheme and artifice to defraud Victim 1, Victim 2, Victim 3, and others (collectively, the “Victim Entities”), and to obtain money and property, including moneys, funds, and credits under the custody and control of federally insured financial institutions, by

means of false and fraudulent pretenses, representations and promises, and (i) for the purpose of executing and attempting to execute the scheme and artifice to defraud, to cause to be transmitted by means of wire communication in interstate commerce, writings, signs, signals, pictures and sounds, in violation of Title 18, United States Code, Section 1343 (Wire Fraud); and (ii) to knowingly execute, and attempt to execute, the scheme and artifice, in violation of Title 18, United States Code, Section 1344(2) (Bank Fraud), to wit: to induce the Victim Entities to transfer funds to accounts controlled by the conspirators, and to cause financial institutions to transmit funds under their custody and control to the conspirators and their designees, all based on material misrepresentations and omissions, including the unlawful use of other persons' identities.

Objects and Purposes of the Conspiracy and Scheme

10. The objects and purposes of the conspiracy and scheme were to: (1) gain unauthorized access to email accounts held by individual users of the Victim Entities; (2) defraud the Victim Entities by requesting payment under materially false and fraudulent pretenses; (3) prevent detection of the conspiracy; and (4) enrich the conspirators and others.

Manner and Means of the Conspiracy and Scheme

11. It was part of the conspiracy and scheme that:

- a. Conspirators sought to compromise, and did compromise, email accounts of businesses, government entities, and other Victim Entities.
- b. Conspirators phished email accounts of individual users within the Victim Entities to obtain unauthorized access to an individual's email account at a Victim Entity, which allowed conspirators to monitor the communications of the individual user and learn the Victim Entity's business practices and contacts.

c. Conspirators typically identified a third-party creditor or vendor to which a Victim Entity owed, or would owe, payment and diverted legitimate email communications from that third-party to the individual user's spam folder.

d. Conspirators created an email account with an address that closely resembled the third-party creditor or vendor entity's email address.

e. Conspirators sent a fraudulent email from this new account to the individual user at the Victim Entity, purporting to request payment to the third-party entity.

f. Conspirators typically included in the fraudulent email payment instructions directing funds to PRN bank accounts, which allowed conspirators to conceal their identities and locations and to appear more legitimate to the Victim Entity.

g. Conspirators caused and attempted to cause the Victim Entity to send money as directed to the PRN bank accounts and other bank accounts that the conspirators controlled.

h. Conspirators caused and attempted to cause banks and financial institutions to transfer funds to accounts that the conspirators controlled under false and fraudulent pretenses, including accounts held in the names of real people and synthetic identities.

i. Conspirators quickly disbursed the stolen funds from the accounts into which they were deposited, often by loading them onto pre-paid debit cards that the conspirators controlled but that were in the names of real people and synthetic identities.

j. Conspirators used the fraudulently obtained funds to enrich themselves and their designees, including family members.

Acts in Furtherance of the Conspiracy and Scheme

12. In furtherance of the conspiracy and scheme, and to accomplish the objects and purposes and conceal the existence thereof, a member of the conspiracy committed and caused to be committed, in the Northern District of Ohio, and elsewhere, the following acts, among others:

13. On or about July 15, 2022, a conspirator, using the alias Angel Adames, registered ODFS as a limited liability company with the Georgia Secretary of State.

14. On or about December 9, 2022, a conspirator, using the alias Angel Adames, registered the domain www.odfsllc.com with Servicer 1, a company that provided cloud-based web development services.

15. On or about April 19, 2023, a conspirator, using the alias Angel Adames, registered an Airwallex account ending in x033e1 in the name of ODFS (the “ODFS Airwallex account”).

16. On or about June 6, 2023, the conspirators caused Victim 1 to wire approximately \$504,576.01 from the Victim 1 Huntington account to a Chase account ending in x3235.

17. On or about June 6, 2023, the conspirators caused Chase to transfer approximately \$504,576.01 to the ODFS Airwallex account, using the Chase account ending in x3235 as a PRN.

18. On or about June 6, 2023, the conspirators caused Victim 2 to wire approximately \$337,680 from the Victim 2 United account to a Chase account ending in x3235.

19. On or about June 6, 2023, the conspirators caused Chase to transfer approximately \$337,680 to the ODFS Airwallex account, using the Chase account ending in x3235 as a PRN.

20. On or about June 7, 2023, Defendant and a coconspirator had a videochat in which Defendant showed the coconspirator a second cell phone depicting a chat conversation in

which Defendant and a coconspirator discussed Chase banking information and a Citibank account ending in x0655 in the name of Entity 1.

21. On or about June 7, 2023, Defendant initiated a transfer of approximately \$98,644.56 from the ODFS Airwallex account to a Citibank account ending in x0655 in the name of Entity 1 with the description “goods_purchased INVOICE 23052.”

22. On or about the dates listed below, Defendant and a coconspirator sent the following WhatsApp messages, each such message constituting an act in furtherance:

	Date	Sender	Recipient	Description
a	June 8, 2023	Coconspirator	Defendant	“Send me screenshot”
b	June 8, 2023	Coconspirator	Defendant	“Send account you want us to use”

23. On or about June 13, 2023, the conspirators caused Victim 3 to wire approximately \$250,000 from the Victim 3 Wells Fargo account to a Chase account ending in x0865.

24. On or about June 13, 2023, the conspirators caused Chase to transfer approximately \$250,000 to the ODFS Airwallex account, using the Chase account ending in x0865 as a PRN.

25. On or about June 15, 2023, the conspirators caused Victim 1 to attempt to wire approximately \$469,200 from the Victim 1 Huntington account to a Trustmark National Bank account ending in x8057, which wire was stopped.

26. On or about the dates listed below, Defendant initiated the following transfers of funds from the ODFS Airwallex account to Pathward pre-paid debit cards in the names, amounts, and with the descriptions set forth below, each such transfer constituting a separate act in furtherance:

	Date	Amount	Description	Name
a	June 7, 2023	\$8,654.19	freight odfs payment	G.H.

	Date	Amount	Description	Name
b	June 7, 2023	\$7,936.34	freight Odfs Payment	C.J.
c	June 7, 2023	\$8,534.29	freight odfs payment	I.G.
d	June 7, 2023	\$4,670.50	wages_salary odfs payment	J.B.
e	June 7, 2023	\$8,718.12	freight odfs	J.M
f	June 7, 2023	\$8,525.13	freight odfs payment	T.J.3
g	June 7, 2023	\$9,363.12	freight odfs payment	C.D.
h	June 7, 2023	\$9,440.00	freight Invoice 7362	A.F.
i	June 7, 2023	\$9,312.50	freight odfs	S.N.
j	June 7, 2023	\$5,093.10	wages_salary odfs payment	J.R.
k	June 7, 2023	\$9,123.50	freight odfs payement	G.G.
l	June 7, 2023	\$9,729.56	freight odfs payment	R.B.
m	June 7, 2023	\$9,434.50	freight odfs Payment	S.D.
n	June 7, 2023	\$6,428.10	wages_salary Odfs Payment	L.M.
o	June 7, 2023	\$8,500.00	freight Invoice 6570	K.V.
p	June 7, 2023	\$9,543.12	wages_salary Odfsllc April payment	P.M.
q	June 7, 2023	\$5,102.12	wages_salary Odfs Payment	W.W.
r	June 7, 2023	\$9,432.34	freight odfs	K.S.2
s	June 7, 2023	\$7,625.50	wages_salary Odfs payment	T.W.
t	June 7, 2023	\$4,984.12	wages_salary Odfs Payment	Z.R.
u	June 7, 2023	\$9,101.59	wages_salary Odfs payment	M.K.
v	June 7, 2023	\$8,196.89	freight odfs payment	C.C.2
w	June 7, 2023	\$6,470.10	wages_salary Odfs May Payment	M.M.
x	June 7, 2023	\$4,816.76	wages_salary Odfs pay	D.R.
y	June 7, 2023	\$9,672.21	freight Odfs payment	L.R.
z	June 7, 2023	\$8,114.13	wages_salary odfs May Payment	W.T.
aa	June 7, 2023	\$4,539.10	wages_salary odfs payment	L.E.
bb	June 7, 2023	\$9,100.12	freight Odfs Payment	B.M.2
cc	June 7, 2023	\$5,372.19	wages_salary odfs payment	P.W.
dd	June 7, 2023	\$7,612.10	wages_salary Odfs Payment	D.H.
ee	June 7, 2023	\$6,000.12	freight Odfs payment	A.W.
ff	June 7, 2023	\$6,500.00	freight Odfs payment	D.M.3
gg	June 7, 2023	\$8,928.12	freight odfs	T.T.
hh	June 7, 2023	\$9,938.23	freight Odfs Payment	D.J.2
ii	June 7, 2023	\$9,673.32	freight odfs payment	P.M.
jj	June 7, 2023	\$5,121.50	wages_salary Odfs Payment	C.C.
kk	June 7, 2023	\$7,616.78	freight Oddf payment	S.D.2
ll	June 7, 2023	\$5,220.00	wages_salary Odfs Payment	T.J.
mm	June 7, 2023	\$9,800.50	freight odfs payment	J.F.
nn	June 7, 2023	\$7,379.23	freight odfs payment	N.G.
oo	June 7, 2023	\$8,266.20	freight ODFS PAYMENT	B.M.

	Date	Amount	Description	Name
pp	June 7, 2023	\$7,983.12	other_services Odfs payment	R.H.
qq	June 7, 2023	\$6,200.00	wages_salary Odfs Payment	L.W.
rr	June 7, 2023	\$4,637.60	wages_salary odfs payement	D.W.
ss	June 7, 2023	\$8,726.10	freight Odfs payment	E.B.
tt	June 7, 2023	\$7,102.12	wages_salary Odfs Payment	N.P.
uu	June 7, 2023	\$5,602.00	wages_salary odfs payment	N.D.
vv	June 7, 2023	\$6,502.10	wages_salary Odfs May payment	R.M.
ww	June 7, 2023	\$8,736.68	freight odfs payment	K.J.
xx	June 7, 2023	\$9,102.12	freight odfs payment	D.T.
yy	June 7, 2023	\$8,121.20	wages_salary Odfs payment	D.P.
zz	June 7, 2023	\$8,622.20	freight odsf payment	D.M.
aaa	June 7, 2023	\$9,000.00	freight odfs payment	K.B.
bbb	June 7, 2023	\$9,453.21	freight odfs payment	D.J.
ccc	June 7, 2023	\$8,736.10	freight odfs payment	A.J.
ddd	June 10, 2023	\$9,164.70	freight odfs	T.E.
eee	June 10, 2023	\$8,940.23	freight odfs paymenyts	G.P.
fff	June 10, 2023	\$8,987.23	freight ODFS PAYMENT	J.C.
ggg	June 10, 2023	\$8,239.34	freight ODFS PAYMENT	L.P.
hhh	June 10, 2023	\$8,477.43	freight ODFS PAYMENT	K.L.
iii	June 10, 2023	\$9,832.45	freight ODFS PAYMENTS	D.M.2
jjj	June 10, 2023	\$9,473.30	freight ODFS PAYMENT	E.S.
kkk	June 10, 2023	\$8,732.23	freight odfs payment	C.A.
lll	June 10, 2023	\$7,950.12	freight ODFS PAYMENT	V.W.
mmm	June 10, 2023	\$9,832.00	freight ODFS PAYMENTS	J.D.
nnn	June 10, 2023	\$8,921.56	freight odfs payment	J.O.
ooo	June 10, 2023	\$9,832.00	freight ODFS PAYMENTS	J.M.2
ppp	June 10, 2023	\$9,891.62	freight ODFS PAYMENT	E.H.
qqq	June 10, 2023	\$9,366.12	freight ODFS PAYMENTS	D.M.
rrr	June 10, 2023	\$9,487.67	freight ODFS PAYMENT	B.S.
sss	June 19, 2023	\$5,000.10	wages_salary ODFS PAYMENTS	M.M.
ttt	June 19, 2023	\$4,980.10	wages_salary ODFS PAYMENT	N.G.
uuu	June 19, 2023	\$5,012.00	wages_salary ODFS PAYMENTS	D.H.
vvv	June 19, 2023	\$5,000.00	wages_salary ODFS PAYMENTS	T.W.
www	June 20, 2023	\$9,893.53	wages_salary ODFS PAYMENT	C.C.2
xxx	June 20, 2023	\$5,000.00	wages_salary odfslc payment	P.W.
yyy	June 20, 2023	\$5,000.00	wages_salary odfslc payment	E.B.
zzz	June 20, 2023	\$5,000.00	wages_salary odfslc	J.B.
aaaa	June 20, 2023	\$5,000.00	wages_salary odfslc	J.R.
bbbb	June 20, 2023	\$4,984.21	wages_salary odfs llc payment	D.W.
cccc	June 20, 2023	\$9,798.21	freight ODFS PAYMENT	D.P.

	Date	Amount	Description	Name
dddd	June 20, 2023	\$4,809.17	wages_salary odfspayment	L.M.
eeee	June 20, 2023	\$5,000.00	wages_salary odfsllc payment	T.T.
ffff	June 20, 2023	\$5,000.00	wages_salary odfsllc	I.G.
gggg	June 20, 2023	\$4,986.00	wages_salary odfsllc payment	G.H.
hhhh	June 20, 2023	\$5,000.00	wages_salary odfsllc	L.W.
iiii	June 20, 2023	\$5,000.00	wages_salary odfsllc payment	L.E.
jjjj	June 20, 2023	\$5,000.00	wages_salary odfsllc payment	G.G.
kkkk	June 20, 2023	\$4,989.01	wages_salary odfsllc payment	N.P.
llll	June 20, 2023	\$9,084.12	freight ODFS PAYMENT	Z.R.
mmmm	June 20, 2023	\$4,987.12	wages_salary odfsllc payment	K.B.
nnnn	June 20, 2023	\$4,989.12	wages_salary odfsllc payment	R.M.
oooo	June 20, 2023	\$5,000.00	wages_salary odfsllc payment	T.J.
pppp	June 20, 2023	\$5,000.00	wages_salary odfsllc payment	A.J.
qqqq	June 20, 2023	\$4,983.00	wages_salary odfsllc	W.W.
rrrr	June 20, 2023	\$4,987.00	wages_salary odfsllc payment	K.V.
ssss	June 20, 2023	\$4,989.00	wages_salary odfsllcpayment	R.B.
tttt	June 20, 2023	\$5,000.00	wages_salary odfsllc payment	A.W.
uuuu	June 20, 2023	\$5,000.00	wages_salary	S.D.2
vvvv	June 20, 2023	\$5,000.00	wages_salary odfsllc	D.R.
wwww	June 20, 2023	\$5,000.00	wages_salary odfsllc payment	A.F.
xxxx	June 20, 2023	\$5,000.00	wages_salary odfsllc payment	S.D.
yyyy	June 20, 2023	\$4,985.00	wages_salary odfsllc	D.M.3
zzzz	June 20, 2023	\$9,358.12	wages_salary ODFSLLC	W.T.
aaaaa	June 20, 2023	\$5,000.00	wages_salary odfsllc payment	M.K.
bbbbb	June 20, 2023	\$5,000.00	wages_salary odfsllc payment	D.T.
cccc	June 20, 2023	\$5,000.00	wages_salary odfsllc payment	N.D.
ddddd	June 20, 2023	\$5,000.00	wages_salary odfsllc	C.C.
eeeee	June 20, 2023	\$5,000.00	wages_salary odfsllc	S.N.

27. On or about the dates listed below, Defendant initiated the following transfers of funds from the ODFS Airwallex account to Central Bank of Kansas pre-paid debit cards in the names, amounts, and with the descriptions set forth below, each such transfer constituting a separate act in furtherance:

	Date	Amount	Description	Name
a	June 20, 2023	\$5,000.00	wages_salary WAGES	K.J.
b	June 20, 2023	\$4,988.12	wages_salary WAGES	G.H.
c	June 20, 2023	\$5,000.12	wages_salary WAGES	A.W.

28. On or about the dates listed below, Defendant and a coconspirator sent the following WhatsApp messages, each such message constituting a separate act in furtherance:

	Date	Sender	Recipient	Text or Description
a	June 20, 2023	Coconspirator	Defendant	“Need drop for Ach(open) for 800k due on 27th so I wan run am early enough. . Yankee 2 yankee” [discussion about anticipating an \$800,000 deposit transferred between U.S.-based banks]
b	June 20, 2023	Defendant	Coconspirator	“Let’s run”
c	June 20, 2023	Defendant	Coconspirator	“I guarantee you”
d	June 20, 2023	Coconspirator	Defendant	“Send full details”
e	June 20, 2023	Coconspirator	Defendant	“Bank name , Ach routing, Account number and bank address”
f	June 21, 2023	Defendant	Coconspirator	Screenshot depicting account details for Chase account ending in x0865 in the name of ODFS
g	June 23, 2023	Defendant	Coconspirator	“To account closed”
h	June 23, 2023	Defendant	Coconspirator	“This morning”
i	June 23, 2023	Defendant	Coconspirator	“Will have to past u another”
j	June 23, 2023	Defendant	Coconspirator	Same text as immediately above accompanied by screenshot depicting account details for “[Entity 2]” account ending in x5845 at Chase
k	June 23, 2023	Defendant	Coconspirator	“Use this one”
l	June 23, 2023	Coconspirator	Defendant	“Ok”

All in violation of Title 18, United States Code, Section 1349.

COUNTS 2-3
(Wire Fraud, 18 U.S.C. §§ 1343 and 2)

The Grand Jury further charges:

29. The factual allegations contained in Count 1 of the Indictment are re-alleged and incorporated by reference as if fully set forth herein.

30. On or about the following dates, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant CHINEDU OPUTE, aiding and abetting others known and unknown to the Grand Jury, having devised and intended to devise the foregoing scheme and

artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, for the purpose of executing the foregoing scheme and artifice to defraud, and attempting to do so, knowingly caused to be transmitted the following writings, signs, signals, pictures, and sounds by means of wire communications in interstate commerce, to wit, the following wire transfers of funds from victims in the Northern District of Ohio, processed through Chase bank account ending in x3235 located outside of the state of Ohio, to the ODFS Airwallex account ending in x033e1 located outside of the United States, each transmission constituting a separate count of this Indictment:

Count	Date	Description	Originating/Location
2	June 6, 2023	Wire transfer of \$504,576.01 from Victim 1	Huntington bank account ending in x7417 in Parma Heights, OH
3	June 6, 2023	Wire transfer of \$337,680 from Victim 2	United bank account ending in x9059 in Bedford, OH

All in violation of Title 18, United States Code, Sections 1343 and 2.

COUNT 4

(Conspiracy to Commit Money Laundering, 18 U.S.C. § 1956(h))

The Grand Jury further charges:

31. The factual allegations contained in Count 1 of the Indictment are re-alleged and incorporated by reference as if fully set forth herein.

32. From in or around June 2023 through on or about the date of this Indictment, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant CHINEDU OPUTE, and others known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate and agree with each other to commit an offense against the United States in violation of Title 18, United States Code, Section 1956, to wit: knowingly conducting and attempting to conduct financial transactions affecting interstate and foreign commerce, which

involved the proceeds of specified unlawful activity, to wit: Wire Fraud, in violation of Title 18, United States Code, Section 1343, and Bank Fraud, in violation of Title 18, United States Code, Section 1344(2), knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

Acts in Furtherance of the Conspiracy

33. In furtherance of the conspiracy, and to accomplish the objects and conceal the existence thereof, a member of the conspiracy committed and caused to be committed, in the Northern District of Ohio, and elsewhere, the following acts, among others:

34. On or about the following dates, a conspirator withdrew funds using pre-paid Pathward debit cards in the names, amounts, and at the bank ATMs set forth below, each such withdrawal constituting a separate act in furtherance:

	Date	Amount	Bank ATM	Account Name
a	June 8, 2023	\$982.50	Wells Fargo	A.F.
b	June 8, 2023	\$982.50	Wells Fargo	D.T.
c	June 8, 2023	\$982.50	Wells Fargo	G.G.
d	June 8, 2023	\$982.50	Wells Fargo	G.H.
e	June 8, 2023	\$983.00	Wells Fargo	J.B.
f	June 8, 2023	\$983.00	Bank of America	J.M.
g	June 8, 2023	\$982.50	Wells Fargo	K.J.
h	June 8, 2023	\$983.00	Wells Fargo	L.E.
i	June 8, 2023	\$983.00	Wells Fargo	R.B.
j	June 9, 2023	\$983.00	Wells Fargo	A.F.
k	June 9, 2023	\$983.00	Wells Fargo	D.T.
l	June 9, 2023	\$983.00	Wells Fargo	G.G.
m	June 9, 2023	\$983.00	Wells Fargo	G.H.
n	June 9, 2023	\$983.00	Wells Fargo	J.B.

	Date	Amount	Bank ATM	Account Name
o	June 9, 2023	\$983.00	Wells Fargo	J.M.
p	June 9, 2023	\$983.00	Wells Fargo	K.J.
q	June 9, 2023	\$983.00	Wells Fargo	L.E.
r	June 9, 2023	\$983.00	Wells Fargo	R.B.
s	June 10, 2023	\$983.00	Wells Fargo	A.F.
t	June 10, 2023	\$983.00	Wells Fargo	D.T.
u	June 10, 2023	\$983.00	Wells Fargo	G.G.
v	June 10, 2023	\$983.00	Wells Fargo	G.H.
w	June 10, 2023	\$983.00	Wells Fargo	J.B.
x	June 10, 2023	\$983.00	Wells Fargo	J.M.
y	June 10, 2023	\$983.00	Wells Fargo	K.J.
z	June 10, 2023	\$983.00	Wells Fargo	L.E.
aa	June 10, 2023	\$983.00	Wells Fargo	R.B.
bb	June 11, 2023	\$983.00	Wells Fargo	A.F.
cc	June 11, 2023	\$983.00	Wells Fargo	G.G.
dd	June 11, 2023	\$983.00	Wells Fargo	G.H.
ee	June 11, 2023	\$983.00	Wells Fargo	J.B.
ff	June 11, 2023	\$983.00	Wells Fargo	J.M.
gg	June 11, 2023	\$983.00	Wells Fargo	K.J.
hh	June 11, 2023	\$983.00	Wells Fargo	R.B.
ii	June 12, 2023	\$983.00	Wells Fargo	D.T.
jj	June 12, 2023	\$983.00	Wells Fargo	L.E.
kk	June 13, 2023	\$983.00	Wells Fargo	A.F.
ll	June 13, 2023	\$983.00	Wells Fargo	D.T.
mm	June 13, 2023	\$983.00	Wells Fargo	E.H.
nn	June 13, 2023	\$983.00	Wells Fargo	G.G.
oo	June 13, 2023	\$983.00	Wells Fargo	G.H.
pp	June 13, 2023	\$703.00	Bank of America	J.B.
qq	June 13, 2023	\$983.00	Wells Fargo	J.M.
rr	June 13, 2023	\$983.00	Wells Fargo	K.J.
ss	June 13, 2023	\$583.00	Bank of America	L.E.
tt	June 13, 2023	\$983.00	Wells Fargo	M.D.
uu	June 13, 2023	\$983.00	Wells Fargo	R.B.
vv	June 13, 2023	\$983.00	Wells Fargo	T.C.
ww	June 14, 2023	\$983.00	Wells Fargo	A.F.
xx	June 14, 2023	\$983.00	Wells Fargo	D.T.
yy	June 14, 2023	\$983.00	Wells Fargo	E.H.
zz	June 14, 2023	\$983.00	Wells Fargo	G.G.
aaa	June 14, 2023	\$983.00	Wells Fargo	G.H.
bbb	June 14, 2023	\$983.00	Wells Fargo	J.M.

	Date	Amount	Bank ATM	Account Name
ccc	June 14, 2023	\$983.00	Wells Fargo	K.J.
ddd	June 14, 2023	\$983.00	Wells Fargo	M.D.
eee	June 14, 2023	\$983.00	Wells Fargo	R.B.
fff	June 14, 2023	\$983.00	Wells Fargo	T.C.
ggg	June 15, 2023	\$983.00	Bank of America	A.F.
hhh	June 15, 2023	\$982.50	Wells Fargo	D.T.
iii	June 15, 2023	\$983.00	Wells Fargo	E.H.
jjj	June 15, 2023	\$983.00	Bank of America	G.G.
kkk	June 15, 2023	\$983.00	Bank of America	G.H.
lll	June 15, 2023	\$983.00	Wells Fargo	J.M.
mmm	June 15, 2023	\$983.00	Wells Fargo	K.J.
nnn	June 15, 2023	\$983.00	Wells Fargo	M.D.
ooo	June 15, 2023	\$983.00	Bank of America	R.B.
ppp	June 15, 2023	\$983.00	Bank of America	T.C.
qqq	June 16, 2023	\$983.00	Wells Fargo	A.F.
rrr	June 16, 2023	\$983.00	Bank of America	D.T.
sss	June 16, 2023	\$982.50	Wells Fargo	G.G.
ttt	June 16, 2023	\$982.50	Wells Fargo	G.H.
uuu	June 16, 2023	\$983.00	Wells Fargo	J.M.
vvv	June 16, 2023	\$983.00	Wells Fargo	K.J.
www	June 16, 2023	\$982.50	Wells Fargo	R.B.
xxx	June 16, 2023	\$983.00	Wells Fargo	T.C.
yyy	June 17, 2023	\$983.00	Wells Fargo	A.F.
zzz	June 17, 2023	\$983.00	Wells Fargo	D.T.
aaaa	June 17, 2023	\$983.00	Wells Fargo	E.H.
bbbb	June 17, 2023	\$983.00	Wells Fargo	G.G.
cccc	June 17, 2023	\$763.00	Wells Fargo	G.H.
dddd	June 17, 2023	\$983.00	Wells Fargo	M.D.
eeee	June 17, 2023	\$983.00	Wells Fargo	R.B.
ffff	June 17, 2023	\$983.00	Wells Fargo	T.C.
gggg	June 18, 2023	\$983.00	Wells Fargo	E.H.
hhhh	June 18, 2023	\$983.00	Wells Fargo	M.D.
iiii	June 19, 2023	\$563.00	Wells Fargo	A.F.
jjjj	June 19, 2023	\$223.00	Wells Fargo	D.T.
kkkk	June 19, 2023	\$983.00	Wells Fargo	E.H.
llll	June 19, 2023	\$243.00	Wells Fargo	G.G.
mmmm	June 19, 2023	\$983.00	Wells Fargo	M.D.
nnnn	June 19, 2023	\$843.00	Wells Fargo	R.B.
oooo	June 19, 2023	\$982.50	Wells Fargo	T.C.
pppp	June 20, 2023	\$983.00	Wells Fargo	E.H.

	Date	Amount	Bank ATM	Account Name
qqqq	June 20, 2023	\$983.00	Wells Fargo	M.D.
rrrr	June 20, 2023	\$982.50	Wells Fargo	T.C.
ssss	June 21, 2023	\$983.00	Wells Fargo	A.F.
tttt	June 21, 2023	\$983.00	Wells Fargo	D.T.
uuuu	June 21, 2023	\$983.00	Wells Fargo	E.H.
vvvv	June 21, 2023	\$983.00	Wells Fargo	G.G.
wwwv	June 21, 2023	\$983.00	Wells Fargo	G.H.
xxxx	June 21, 2023	\$983.00	Wells Fargo	J.B.
yyyy	June 21, 2023	\$823.00	Wells Fargo	J.M.
zzzz	June 21, 2023	\$843.00	Wells Fargo	K.J.
aaaaa	June 21, 2023	\$983.00	Wells Fargo	L.E.
bbbbb	June 21, 2023	\$983.00	Wells Fargo	M.D.
ccccc	June 21, 2023	\$983.00	Wells Fargo	R.B.
dddd	June 21, 2023	\$983.00	Wells Fargo	T.C.
eeeee	June 22, 2023	\$983.00	Bank of America	A.F.
ffff	June 22, 2023	\$983.00	Bank of America	D.T.
ggggg	June 22, 2023	\$983.00	Wells Fargo	E.H.
hhhhh	June 22, 2023	\$983.00	Bank of America	G.G.
iiiii	June 22, 2023	\$983.00	Bank of America	G.H.
jjjjj	June 22, 2023	\$983.00	Bank of America	J.B.
kkkkk	June 22, 2023	\$983.00	Bank of America	L.E.
lllll	June 22, 2023	\$983.00	Wells Fargo	M.D.
mmmmm	June 22, 2023	\$983.00	Wells Fargo	R.B.
nnnnn	June 22, 2023	\$983.00	Wells Fargo	T.C.
ooooo	June 23, 2023	\$983.00	Wells Fargo	A.F.
ppppp	June 23, 2023	\$983.00	Wells Fargo	D.T.
qqqqq	June 23, 2023	\$983.00	Wells Fargo	E.H.
rrrrr	June 23, 2023	\$983.00	Wells Fargo	G.G.
sssss	June 23, 2023	\$983.00	Wells Fargo	G.H.
ttttt	June 23, 2023	\$983.00	Wells Fargo	J.B.
uuuuu	June 23, 2023	\$983.00	Wells Fargo	L.E.
vvvvv	June 23, 2023	\$983.00	Wells Fargo	M.D.
wwwww	June 23, 2023	\$983.00	Wells Fargo	R.B.
xxxxx	June 23, 2023	\$983.00	Wells Fargo	T.C.
yyyyy	June 23, 2023	\$983.00	Wells Fargo	T.M.
zzzzz	June 24, 2023	\$983.00	Wells Fargo	A.F.
aaaaaa	June 24, 2023	\$983.00	Bank of America	D.T.
bbbbbb	June 24, 2023	\$23.00	Wells Fargo	E.H.
cccccc	June 24, 2023	\$983.00	Wells Fargo	G.G.
dddddd	June 24, 2023	\$983.00	Wells Fargo	G.H.

	Date	Amount	Bank ATM	Account Name
eeeeee	June 24, 2023	\$983.00	Bank of America	J.B.
ffffff	June 24, 2023	\$983.00	Wells Fargo	L.E.
ggggggg	June 24, 2023	\$73.00	Wells Fargo	M.D.
hhhhhh	June 24, 2023	\$983.00	Wells Fargo	R.B.
iiiiii	June 24, 2023	\$983.00	Wells Fargo	T.C.
jjjjjj	June 24, 2023	\$983.00	Wells Fargo	T.M.
kkkkkkk	June 25, 2023	\$983.00	Bank of America	A.F.
llllll	June 25, 2023	\$983.00	Wells Fargo	D.T.
mmmmmm	June 25, 2023	\$983.00	Wells Fargo	G.G.
nnnnnnn	June 25, 2023	\$983.00	Wells Fargo	G.H.
ooooooo	June 25, 2023	\$983.00	Wells Fargo	J.B.
ppppppp	June 25, 2023	\$983.00	Wells Fargo	L.E.
qqqqqqq	June 25, 2023	\$983.00	Wells Fargo	R.B.
rrrrrrr	June 27, 2023	\$983.00	Wells Fargo	T.C.
ssssss	June 27, 2023	\$983.00	Wells Fargo	T.M.
ttttttt	June 28, 2023	\$983.00	Wells Fargo	T.C.
uuuuuuu	June 28, 2023	\$983.00	Bank of America	T.M.
vvvvvvv	June 29, 2023	\$983.00	Wells Fargo	T.C.
wwwwwww	June 29, 2023	\$983.00	Wells Fargo	T.M.
xxxxxxx	June 30, 2023	\$983.00	Wells Fargo	T.C.
yyyyyyy	June 30, 2023	\$983.00	Wells Fargo	T.M.
zzzzzzz	July 1, 2023	\$983.00	Wells Fargo	T.C.
aaaaaaa	July 1, 2023	\$983.00	Wells Fargo	T.M.
bbbbbbb	July 2, 2023	\$983.00	Wells Fargo	C.R.
ccccccc	July 2, 2023	\$983.00	Wells Fargo	T.C.
ddddddd	July 2, 2023	\$563.00	Wells Fargo	T.M.
eeeeeee	July 5, 2023	\$983.00	Bank of America	C.R.
fffffff	July 5, 2023	\$983.00	Bank of America	T.C.
ggggggg	July 7, 2023	\$983.00	Wells Fargo	C.R.
hhhhhhh	July 7, 2023	\$983.00	Wells Fargo	T.C.
iiiiiii	July 9, 2023	\$983.00	Wells Fargo	C.R.
jjjjjjj	July 9, 2023	\$393.00	Wells Fargo	T.C.
kkkkkkk	July 10, 2023	\$983.00	Wells Fargo	C.R.
lllllll	July 12, 2023	\$983.00	Wells Fargo	C.R.
mmmmmmm	July 13, 2023	\$983.00	Wells Fargo	C.R.
nnnnnnn	July 14, 2023	\$982.50	Wells Fargo	C.R.
ooooooo	September 18, 2023	\$63.00	Wells Fargo	A.F.
ppppppp	September 18, 2023	\$63.00	Wells Fargo	G.G.
qqqqqqq	September 18, 2023	\$63.00	Wells Fargo	L.E.
rrrrrrr	September 19, 2023	\$63.00	Wells Fargo	D.T.

	Date	Amount	Bank ATM	Account Name
sssssss	September 19, 2023	\$43.00	Wells Fargo	G.H.
ttttttt	September 19, 2023	\$83.00	Wells Fargo	J.B.
uuuuuuu	September 19, 2023	\$63.00	Wells Fargo	R.B.

35. On or about the following dates, Defendant withdrew funds at Wells Fargo ATMs using pre-paid Pathward debit cards in the names and amounts set forth below, each such withdrawal constituting a separate act in furtherance:

	Date	Account Name	Amount
a	November 2, 2023	T.M.	\$983.00
b	November 2, 2023	J.B.	\$903.00
c	November 2, 2023	C.R.	\$583.00
d	November 2, 2023	J.M.	\$503.00
e	November 2, 2023	G.H.	\$233.00
f	November 13, 2023	A.F.	\$983.00
g	November 13, 2023	C.R.	\$983.00
h	November 13, 2023	G.G.	\$983.00
i	November 13, 2023	J.M.	\$983.00
j	November 13, 2023	T.M.	\$983.00
k	November 13, 2023	J.B.	\$943.00
l	November 13, 2023	D.T.	\$773.00
m	November 14, 2023	K.J.	\$983.00
o	November 20, 2023	D.R.	\$983.00
p	November 20, 2023	G.H.	\$983.00
q	November 20, 2023	K.J.	\$983.00
r	November 20, 2023	L.E.	\$983.00
s	November 20, 2023	M.D.	\$983.00
t	November 20, 2023	R.B.	\$983.00
u	November 20, 2023	E.H.	\$982.50
v	November 20, 2023	T.C.	\$982.50
w	November 20, 2023	C.R.	\$722.50
x	November 20, 2023	T.M.	\$332.50
y	November 20, 2023	A.F.	\$152.50
z	November 20, 2023	J.M.	\$142.50

All in violation of Title 18, United States Code, Section 1956(h).

COUNTS 5-8

(Aggravated Identity Theft, 18 U.S.C. §§ 1028A(a)(1) and 2)

The Grand Jury further charges:

36. The factual allegations contained in Paragraphs 1 through 7 and 9 through 28 of the Indictment are re-alleged and incorporated by reference as if fully set forth herein.

37. On or about the dates listed below, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant CHINEDU OPUTE did knowingly transfer, possess, and use, and did aid and abet the transfer, possession, and use of, a means of identification of another person, without lawful authority, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit: Wire Fraud, in violation of Title 18, United States Code, Section 1343, Bank Fraud, in violation of Title 18, United States Code, Section 1344(2), and Conspiracy to Commit Fraud Offense, in violation of Title 18, United States Code, Section 1349, knowing that the means of identification belonged to another actual person, to wit: the following transfers of funds from the ODFS Airwallex account to the following Pathward pre-paid debit cards, each transfer, possession, and use constituting a separate count of this Indictment:

Count	Date	Pathward Card No.	Description	Amount	Name
5	June 7, 2023	x8703	wages salary odfs payment	\$4,670.50	J.B.
6	June 7, 2023	x1108	freight odfs payment	\$8,736.68	K.J.
7	June 7, 2023	x7002	freight odfs payment	\$9,102.12	D.T.
8	June 10, 2023	x2405	freight ODFS payment	\$9,891.62	E.H.

All in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.